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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JUAN CARLOS MARTINEZ CASTRO, and
SHANNON JEFFRIES,
15 Defendants.
16

CASE NO. 2:19-CR-00233-TLN
STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER
DATE: September 1, 2022
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

17
18 **STIPULATION**

- 19 1. By previous order, this matter was set for status on September 1, 2022.
20 2. By this stipulation, the defendants now move to continue the status conference until
21 December 1, 2022, at 9:30 a.m., and to exclude time between September 1, 2022, and December 1,
22 2022, under Local Code T4.
23 3. The parties agree and stipulate, and request that the Court find the following:
24 a) Counsel for the defendants desire additional time consult with their clients, review
25 the discovery, conduct defense investigation and research, discuss potential resolution, and
26 otherwise prepare for trial.
27 b) Counsel for the defendants believe that failure to grant the above-requested
28 continuance would deny them the reasonable time necessary for effective preparation, taking into

account the exercise of due diligence.

c) The government does not object to the continuance.

d) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of September 1, 2022 to December 1, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 24, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ JUSTIN L. LEE
JUSTIN L. LEE
Assistant United States Attorney

Dated: August 24, 2022

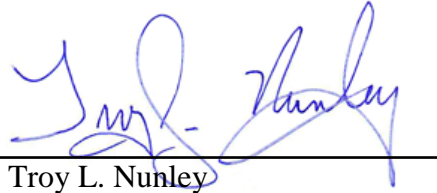
/s/ HANNAH LABAREE
HANNAH LABAREE
Counsel for Defendant
JUAN CARLOS MARTINEZ CASTRO

Dated: August 24, 2022

/s/ CHRIS COSCA
CHRIS COSCA
Counsel for Defendant
SHANNON JEFFRIES

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 24th day of August, 2022.



Troy L. Nunley
United States District Judge